

REMARKS

Priority Claim

Form PTOL-326, which accompanies the office action, notes that some but not all of the required priority documents have been received. The office action does not, however, indicate what copies are further required to perfect Applicant's priority claim. Accordingly, Applicant requests clarification as to what additional documents are required.

Amendments to Specification

Applicant amends the specification by adding the suggested headers and by deleting or modifying selected paragraphs to achieve greater consistency with U.S. practice. No new matter is introduced.

Amendment to the drawing

The present drawing includes numerous system elements labeled with reference numbers that are identified in the specification. Applicant provides a substitute drawing in which these system elements are now labeled both with reference numbers and with text taken from the specification. No new matter is introduced by this amendment.

Allowable subject matter

Applicant acknowledges the indication of allowable subject matter in claims 2-5, 8-10, 13-16, and 19-21.

Section 102 rejection

Ho does not appear to teach a *non-linear* echo cancellation device. Nor does it appear to teach a device for adaptation of echo cancellation that includes two linear models and a non-linear model. In fact, the system disclosed by *Ho* appears to be a linear system.

The Office Action draws particular attention to FIGS. 3 and 4 and to the accompanying descriptive text. However, the echo canceller 100 disclosed therein appears to carry out only linear operations on the data.

A rejection under section 102 requires that the cited reference teach or suggest each and every limitation recited in the claim. In this case, the cited reference fails to disclose: a *non-*

linear device for adaptive echo cancellation. The cited reference also fails to disclose a *nonlinear* device having first and second linear models and a *nonlinear* model configured to determine coefficients for adaptive echo cancellation. The cited reference also fails to disclose an echo cancellation device having a *nonlinear* unit in communication with the nonlinear model.

Applicant requests that the Examiner identify with greater particularity the specific portions of the cited reference that teach the limitation of a *non-linear*, as opposed to a linear device, and that the Examiner identify precisely where the cited reference discloses a *nonlinear* model and the *nonlinear* unit in communication with the nonlinear model.

Alternatively, if the Examiner is unable to identify the purported disclosure of these elements in the cited reference, Applicant requests withdrawal of the section 102 rejection of the independent claims and all claims dependent thereon.

Summary

Now pending in this application are claims 1-22, of which claims 1, 7, 12, and 18 are independent. No additional fees are believed to be due in connection with this response.

However, to the extent fees are due, or if a refund is forthcoming, please adjust our deposit account 06-1050.

Respectfully submitted,

Date: 12/1/03



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